

**IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICK GILLESPIE,)
Plaintiff,) No. 14-cv-09176
v.) Honorable Judge Gary Feinerman
BLITT AND GAINES, P.C.,)
Defendant.)

DEFENDANT'S LOCAL RULE 56.1(a) STATEMENT OF MATERIAL FACTS IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT

Defendant, Blitt and Gaines, P.C. (“Blitt”), by and through its attorney, Michael L. Starzec, respectfully submits the following Local Rule 56.1(a)(3) Statement of Material Facts in Support of its Motion For Summary Judgment:

Facts Supporting Summary Judgment

On November 15, 2013, Blitt, on behalf of Citibank, N.A, filed a complaint in the Circuit Court of Cook County, Illinois at the Richard J. Daley Center Courthouse against the Plaintiff, Patrick Gillespie (“Gillespie”) in an action styled Citibank NA. v. Patrick Gillespie, docket number 2013 MI 162837. (Complaint, pg. 2, ¶8, Exhibit 1; Answer, pg. 2, ¶8, Exhibit 2).

At the time the Collection Action was filed, Gillespie resided at 2633 Rhodes Avenue, River Grove, Illinois 60171. (Complaint, pg. 3, ¶13, Exhibit 1; Answer, pg.3, ¶13, Exhibit 2).

Gillespie was later served at that address. (Exhibit A to Complaint, pg. 2, Exhibit 1).

Gillespie never filed an appearance in the Collection Case resulting in the entry of a default judgment. (Exhibit A to Complaint, Exhibit 1).

Respectfully submitted,

By: s/Michael L. Starzec
Michael L. Starzec

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CERTIFICATE OF SERVICE

I, the undersigned, certify that I filed Defendant's Local Rule 56.1(a) Statement of Material Facts through the Court's ECM/CF system, which will cause electronic notification of this filing to be sent to all counsel of record on March 27, 2015.

By: s/Michael L. Starzec
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